

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CHROME HEARTS LLC, a Delaware  
Limited Liability Company,

Plaintiff,

vs.

CONTROSE, INC., a New York  
Corporation; BOB KUNG, an  
Individual and DOES 1-10, inclusive,

Defendants.

Civil Action No. 1:21-cv-06858-LJL

**ORDER GRANTING  
STIPULATION RE PERMANENT  
INJUNCTION**

WHEREAS Plaintiff Chrome Hearts LLC (“Chrome Hearts” or “Plaintiff”) has filed the operative First Amended Complaint (“FAC”) in this action against defendants Controse, Inc. and Bob Kung (“Defendants”) alleging Federal Trademark Infringement, False Designations of Origin, and Common Law Trademark Infringement and Unfair Competition, all allegedly arising from Defendants’ manufacture, production, distribution, promotion, advertisement, offering for sale, and/or sale of certain products bearing identical, substantially indistinguishable, or confusingly similar reproductions of one or more of the Chrome Hearts’ federally registered marks (the “Accused Products.”). Chrome Hearts’ trademarks at issue are identified in Exhibit A. Exemplar photographs of the Accused Products are shown in ¶ 24 of the FAC and reproduced in Exhibit B for reference.

WHEREAS the Parties have entered into a Confidential Settlement Agreement to fully resolve all of the claims in this action among the Parties;

WHEREAS without any admission of liability, Defendants have agreed to consent to the below terms of a permanent injunction, and IT IS HEREBY

ORDERED THAT:

1. Defendants and their agents, servants, employees and all entities and/or persons in active concert and participation with Defendant are hereby permanently restrained and enjoined from infringing upon the Chrome Hearts Marks in Exhibit A, including, but not limited to:

- a. manufacturing, purchasing, producing, distributing, circulating, selling, offering for sale, importing, exporting, advertising, promoting, displaying, shipping, marketing, or otherwise incorporate in advertising or marketing the Accused Products or products bearing the Chrome Hearts Marks;
- b. delivering, holding for sale, returning, transferring, or otherwise moving, storing, or disposing in any manner the Accused Products or products bearing the Chrome Hearts Marks;
- c. knowingly assisting, aiding, or attempting to assist or aid any other person or entity in performing any of the prohibited activities referred to in Paragraphs 1(a)-(b) above; and
- d. knowingly affecting any transactions, assignments or transfers, or form new entities or associations to circumvent the prohibitions referred to in Paragraphs 1(a)-(b) above.

WHEREAS the parties have further agreed as follows, and IT IS HEREBY FURTHER ORDERED THAT:

2. This Court has jurisdiction over the Parties herein and has jurisdiction over the subject matter hereof pursuant to 15 U.S.C. § 1121.

3. The execution of this Stipulation/Order shall serve to bind and obligate the Parties hereto.

4. Upon satisfaction of other obligations set forth in the Settlement Agreement, the Parties will stipulate to and file a separate *Dismissal with Prejudice of the Civil Action*.

5. The jurisdiction of this Court is retained for the purpose of making any further orders necessary or proper for the enforcement of this Stipulation/Order.

**IT IS SO ORDERED.**

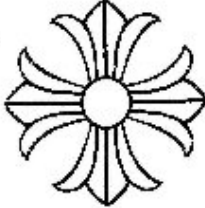
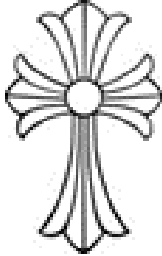
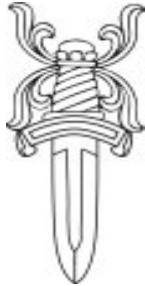
Dated: October 4, 2023

SO ORDERED.

A handwritten signature in black ink, appearing to read 'L. Liman', is written over a horizontal line.

LEWIS J. LIMAN  
United States District Judge

**EXHIBIT A**

<b>Chrome Hearts' Mark</b>	<b>U.S. Reg. No.</b>	<b>Goods/Services</b>
	3,385,449	Jewelry, namely, rings, earrings, pendants, cuff bracelets, bracelets, necklaces, cuff links, watch bracelets, brooches and dog tags for wear by humans for decorative purposes.
	3,605,860	Jewelry, namely, rings, earrings, pendants, necklaces, bracelets, cuff bracelets, cuff links, watch bracelets and key rings made of precious metals.
	4,510,020	Jewelry, namely, rings, earrings, necklaces, bracelets, cuff bracelets, brooches, cuff links, key rings, watch bracelets and tie fasteners.



